



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

FEB 27 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Karl Sandstrom
Perkins Coie LLP
607 Fourteenth Street N.W.
Washington, DC 20005-2011

RE: MUR 5672
Jack Davis
Save American Jobs Association, Inc.
Jack Davis for Congress and Robert R. Davis, in his
official capacity as treasurer
Save Jobs Party and Jack Davis, in his official
capacity as treasurer

MUR 5733
Jack Davis
Save American Jobs PAC
Davis for Congress (f/k/a Jack Davis Exploratory
Committee) and Alan J. Davis, in his official
capacity as treasurer
Save Jobs Party and Jack Davis, in his official
capacity as treasurer

Dear Mr. Sandstrom:

On August 1, 2005, the Federal Election Commission notified your client, Jack Davis for Congress and Robert R. Davis, in his official capacity as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended, (the "Act"). On April 24, 2006, the Commission notified your clients, Jack Davis, Save American Jobs PAC, Davis for Congress (f/k/a Jack Davis Exploratory Committee) and Alan J. Davis, in his official capacity as treasurer, and the Save Jobs Party and Jack Davis, in his official capacity as treasurer, of another complaint alleging violations of certain sections of the Act. On December 12, 2006 and January 9, 2006, the Commission, on the basis of the information in the complaint, and information provided by your clients, made the following findings as to your clients.

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The Commission found there is no reason to believe Mr. Davis violated 2 U.S.C. § 441a by making an excessive contribution or 2 U.S.C. § 441d and 11 C.F.R. § 110.11(a) by failing to include a required disclaimer. The Commission also exercised its prosecutorial discretion and dismissed the allegations that Mr. Davis violated 2 U.S.C. §§ 432(e)(1) and 433 by failing to timely register as a candidate and timely register a committee.

The Commission found there is no reason to believe that Davis for Congress (f/k/a Jack Davis Exploratory Committee) and Alan J. Davis, in his official capacity as treasurer, violated 2 U.S.C. § 441b by knowingly receiving prohibited contributions, 2 U.S.C. § 441d and 11 C.F.R. § 110.11(a) by failing to include a required disclaimer, or 2 U.S.C. § 441a by exceeding the contribution limits for affiliated committees. The Commission also exercised its prosecutorial discretion and dismissed the allegations that Davis for Congress (f/k/a Jack Davis Exploratory Committee) and Alan J. Davis, in his official capacity as treasurer, violated 2 U.S.C. § 434(b) by failing to report in-kind contributions or 2 U.S.C. § 433 or 434(a) by failing to timely register and disclose its activities.

The Commission found there is no reason to believe Save Jobs Party and Jack Davis, in his official capacity as treasurer, violated 2 U.S.C. § 433, 11 C.F.R. § 102.1(d) or 11 C.F.R. § 104.1(a) by failing to disclose expenditures or comply with the Act's source prohibitions, 2 U.S.C. § 434(b)(5)(a) by failing to adequately identify the purpose for its expenditures, 2 U.S.C. § 441a by knowingly receiving excessive contributions or by exceeding the contribution limits for affiliated committees, or 2 U.S.C. § 441b by knowingly receiving prohibited contributions.

The Commission found there is no reason to believe that the Save American Jobs PAC violated 2 U.S.C. § 441b by making a prohibited contribution and that there is no reason to believe the Save American Jobs Association violated 2 U.S.C. § 441b by making prohibited contributions to the Save Jobs Party. The Commission also dismissed the allegations that the Save American Jobs Association violated 2 U.S.C. § 441b by making prohibited contributions to Davis for Congress and 2 U.S.C. § 441a by exceeding the contribution limits for affiliated committees.

Finally, the Commission found there is no reason to believe Jack Davis for Congress and Robert R. Davis, in his official capacity as treasurer, violated the Act.

Accordingly, the Commission closed its files in these matters. Documents related to the cases will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003). A copy of the General Counsel's Report is enclosed for your information, and a Statement of Reasons from one or more Commissioners will follow.

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Karl Sandstrom
MURs 5672 & 5733
Save Jobs Party, et al.
Page 3

If you have any questions, please contact Zachary Mahshie, the attorney assigned to this matter at (202) 694-1650.

Sincerely,
Thomasenia Duncan
Acting General Counsel



BY: Rhonda J. Vosdingh
Associate General Counsel for Enforcement

Enclosure
General Counsel's Report

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